



January 29, 2022

VIA ECF

The Honorable Laura Taylor Swain
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: *United States v. Juan Calderon*, 18-CR-319 (LTS)

Dear Judge Swain:

Defendant Juan Calderon is scheduled to be sentenced by this Court on February 15, 2022, and defense counsel's sentencing submission is currently due on Tuesday, February 1, 2022 pursuant to this Court's individual rules. Unfortunately, due to COVID-19 conditions and staffing shortages at MDC Brooklyn, it has been difficult to schedule legal calls with Mr. Calderon and some of our calls, including one yesterday, have been canceled. The final Presentence Report has also not yet been disclosed. We would therefore respectfully request an extension, until Friday, February 4, 2022, to submit our sentencing memo on Mr. Calderon's behalf, as we are hopeful to have a legal call with him next week. The Government has consented to this extension, and would request to have until Thursday, February 10, 2022, to file any sentencing submission.

Mr. Calderon is eager to proceed to sentencing, so we are hopeful that the proposed briefing schedule would still enable Mr. Calderon to be sentenced on February 15, 2022 as scheduled, but if the Court requires additional time to review the parties' submissions, we would respectfully request that any adjournment of the sentencing date be as brief as the Court's schedule and convenience permits.

Thank you for your consideration.

Sincerely,

/s/ Kristen M. Santillo

Kristen M. Santillo

Attorney for Juan Calderon

Cc: AUSA Jamie Bagliebter
AUSA Margaret Graham

Application granted. The parties shall make their sentencing submissions on the schedule set forth above. DE#461 resolved.

SO ORDERED.

Dated: January 31, 2022

/s/ Laura Taylor Swain, Chief U.S.D.J.